

The National Grange

Of the Order of Patrons of Husbandry

Building Communities



July 20, 2009

Chairman Julius Genachowski
Commissioner Michael Copps
Commissioner Robert McDowell
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Docket No. 09-51 (National Broadband Plan)

Dear FCC Chairman and Commissioners:

The National Grange would like to thank you for receiving our initial comments on the development of the National Broadband Plan and reiterate our support for its ultimate adoption. Broadband service has become a critically important component in the daily lives of all Americans, including family farmers, rural residents and small businesses. The National Grange is the nation's oldest general farm and rural public interest organization. With more than 2,700 chapters in over 40 states, the National Grange represents a significant portion of our country's rural population, many of whom have limited or no access to the benefits of broadband internet.

We strongly urge the FCC to develop a National Broadband Plan that achieves 100% access to high speed internet service for all citizens of the United States. Just as the early twentieth century public infrastructure initiatives that provided access to Rural Free mail, electricity, telephone service and transportation produced tremendous opportunities for economic growth and improved quality of life in farming, rural and tribal communities, so too will 100% broadband internet access in the 21st century. Unfortunately, too many family farmers, rural residents and rural small businesses are unable to access broadband technology simply because there is no service provided in their area.

The National Grange believes that in order to address the broadband access needs of these unserved rural Americans, it is critically important to first identify whom these individuals, family farmers and small businesses are and where they are located. That is why it is so important that the nation develop detailed maps showing which areas lack broadband access and need deployment by the end of 2009. This can be accomplished quickly and accurately while protecting the legitimate privacy concerns of broadband providers and subscribers alike. Successful mapping programs should create accurate, transparent and useful maps that provide support and direction to state and local leaders, broadband providers and interested citizens as well as incorporate a meaningful public feedback loop and third party validation to assess data

collection methodology and the effectiveness of data dissemination at the local level. Successful broadband mapping also need only require an aggregation of information about which physical locations have the ability to subscribe to any service through a broadband network, without having to publicly disclose private business related data or without having to disclose private data about individual subscribers. The National Grange believes that failure to incorporate strong provisions to protect the legitimate business confidentiality and individual privacy interests of broadband providers, small businesses, family farmers, and consumers will deter rather than promote the goal of universal broadband adoption in unserved farming, rural and tribal communities.

The National Grange believes that an effective universal broadband utilization strategy must specifically encourage and foster greater participation by potential third party beneficiaries (both in the government and private sectors) who have a clear economic interest or defined public mission to serve rural and remote customers and clients in a cost effective manner through the development of both active and passive applications that can be deployed via the Internet and that require minimal direct interface between users and computers. One of the most effective examples of involving third party payers in providing active and passive applications that directly serve rural customers and clients that will potentially increased utilization of broadband in rural areas is through the expanded provision of telemedicine.

As the Commission is aware, rural hospitals, clinics, and patients currently have the least access to specialized medical care. The development of telemedicine has created a wonderful opportunity to provide quality, timely medical treatment to those citizens who currently have little or no access to the specialized care they need. Indeed, telemedicine is proven to be a cost-effective solution to providing health care, especially long term health care, to the elderly, unemployed, disabled, low income, and chronically ill. The National Grange sincerely hopes that the National Broadband Plan addresses this digital divide by providing resources to assist citizens, family farmers, small businesses, health care providers, and municipalities in these areas in the purchase of the equipment, in the development of internet based software, applications and services and the physical infrastructure needed to better serve their communities' basic health care needs via telemedicine. In addition, such low income families and organizations that need greater access to broadband internet should also be provided with appropriate education, technical support, and outreach services to help develop their computing skills and other skills that will be necessary to implement telemedicine programs.

As more Americans gain access to broadband, it is essential that networks be managed in ways that encourage growth and innovation while ensuring that essential services are given priority. As the Internet increasingly incorporates high bandwidth utilizing technologies, it becomes even more useful to rural Americans and more useful to service providers who need to reach rural customers to provide access to resources that otherwise might not be available in rural or tribal communities. The National Grange believes that one-size-fits all, regulatory prohibitions that dictate the management of the Internet's infrastructure will be counter productive. Specifically, the National Grange believes that maintaining private network management is a key purveyor of the unique and reliable end user expectations for broadband in farming, rural and tribal areas. We would like to see the National Broadband Plan establish network management solutions that will include input from both the public and private sectors so that essential and critical uses of

broadband such as telemedicine are not disrupted by non-essential activity such as spam, viruses, worms, and other impediments to broadband internet usage.

In addition the National Grange strongly endorses comments submitted under this NOI by the American Federation of Television and Radio Artists, AFL-CIO, et al., which in turn, referenced the Commission's *Report on Rural Broadband Strategy*. Those comments strongly encouraged the development and deployment of network management technologies that can ensure and enhance the safety and security of the Internet by assuring that unlawful conduct and/or the distribution of unlawful content are not inadvertently protected by over broad regulatory policy or principals.

The Commission has previously adopted a comprehensive *Internet Policy Statement* that broadly describes the basic rights of internet users to access lawful content, run applications and services, connect devices to the network and enjoy the advantages of competition. The National Grange supports the continued oversight by the Commission to enforcing the principals of the *Internet Policy Statement* as part of the National Broadband Plan. However, the National Grange believes that unmanaged networks remain far too unstable a platform to provide critical services such as telemedicine and emergency response care or to provide measured, timely, appropriate or specific enforcement responses to unlawful conduct, unlawful content or other inappropriate use of system resources that may degrade the experiences of normal internet users. The National Grange believes, instead, that privately managed networks, operating under the principals contained in the Commission's *Internet Policy Statement*, will provide the necessary stabilizing influence to ensure service reliability to family farmers, consumers and rural small businesses.

The National Grange sincerely appreciates your consideration of our response comments in the development of the National Broadband Plan. We continue to broadly support the proposals outlined in the comprehensive rural broadband strategy report titled *Bringing Broadband to Rural America* and applaud its release in conjunction with the NOI. The National Grange understands that bringing broadband internet access to every rural and tribal area in the United States is a lofty goal with many complex challenges involved. However, farming, rural and tribal communities collectively offer too large and too important a market to be ignored or excluded from access to internet based commercial services. Farming, rural and tribal communities are equally critical areas for effective Internet based delivery of public services funded by local, state and Federal government agencies. The National Grange believes that access to competitive broadband internet services is essential for the economic sustainability of vibrant and economically important farming, rural and tribal communities across the nation.

Sincerely,

Leroy Watson

Leroy Watson, Legislative Director
National Grange of the Order of Patrons of Husbandry